

**VIA ELECTRONIC MAIL**

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**PACIFIC RACEWAYS: ASSESSMENT OF HABITAT FOR SPECIES OF CONCERN**

Date December 14, 2017

Dear Jason,

Ramboll Environ were retained by Pacific Raceways to conduct a habitat survey and survey for species of potential concern on a parcel called "Lot A" at the Pacific Raceways property that is designated for proposed development (Figure 1). The survey was conducted to characterize the major habitat types and habitat quality on Lot A and catalogue plants and vertebrates (birds, reptiles, amphibians, and mammals) present on Lot A by direct observation. The objective of the survey was to determine whether the planned development would result in the degradation or conversion of habitat for Species of Concern.

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**Species of Concern**

The state of Washington and the federal government of the United States of America list species that are protected in Washington Administrative Code (WAC 232-12-297, Section 2.4) and the federal Endangered Species Act. The most recent lists of these species are provided by the Washington Department of Natural Resources (WDNR) through their Washington Natural Heritage Program (Attachment 1), and through the Washington Department of Fish and Wildlife (WDFW; Attachment 2).

**Site background and habitat**

Lot A is within the Eastern Puget Upland Level IV Ecoregion, which was a mosaic of coniferous forest and prairie before urbanization. Lot A is currently a 40 acre parcel of mowed field with a roughly 4.5 acre gravel pad within the mowed area; the whole parcel is surrounded by a border of trees of varying widths (Figure 2). On the south end, there is a road with a gated fence along the whole length of Lot A; along the inside of the fence there is a single row of conifers with few to no

understory plants; the area appears mowed. Along the western edge of Lot A is a road that is separated from Lot A partially by a fence and gate and partially by a low rise. Along the length of the western border road, the strip of conifers varies between one tree to roughly 50 feet of trees with low understory in some places. The north edge of Lot A borders a constructed depression with a strip of trees and understory roughly 70 to 100 feet wide. The east side of Lot A borders a housing development and has a barrier of trees with understory roughly 100 to 130 feet wide. The area between the trees and the field on the north and east sides of Lot A have a great deal of scotch broom and Himalayan blackberry. The majority of the plant and animal diversity observed occurred on the north and east borders, which we characterized as remnant mixed hardwood-conifer forest<sup>1</sup>. The trees are predominantly Douglas-fir with some western hemlock, a patch of cottonwoods, and one bigleaf maple sapling (Table 1).

Prior to 2003, Lot A was forested with fairly mature second growth. Clearing of Lot A began in 2003 and was completed by 2005 and has remained relatively unchanged. Lot A is located at more than 1,500 feet from Soosette Creek and Big Soos Creek and their associated riparian corridors. Lot A is also located over ¼ mile from slopes leading to Soosette Creek and has no sensitive areas. It is isolated from other nearby natural areas by residential development and the remainder of the Pacific Raceways property, limiting natural corridors for wildlife movement. Native plant recruitment to Lot A is limited because it is maintained as a field by frequent mowing (vegetation rarely reaches 6" in height). The lot is mowed because it is used as a parking lot by the nearby Green River College and for overflow parking during large events at Pacific Raceways (Figure 3). Invasive species of plants have colonized and grown around the edges of Lot A and were found on the mowed field itself (Table 1). Without continued mowing the site would most likely become dominated by scotch broom and Himalayan blackberry.

Pacific Raceways plans to expand their operation on Lot A. The Project is presented in three phases and may include the Pacific Innovation Center with hobbyist garages and additional retail space. Attachment 3 presents a Preliminary Site Plan developed for the Project by ESM Engineering Consultants, LLC. Ramboll-Environ understand that a 25 foot landscaped buffer will be maintained on the north and east sides. Below we further discuss Lot A's background and habitat, listed species in the region, and finally the plant and animal species found during a field expedition to Lot A.

### Field Survey

Ramboll surveyed Lot A on 12/11/2017. Weather was fair with clear skies and temperatures in the upper 30s and low 40s Fahrenheit with calm winds. A strip of the mowed field along the southern edge of the property approximately 150 feet in width was covered in thick frost due to shading. Other areas within the border of trees were also covered in a thick frost. The height of the plants on the mowed field was approximately two inches and consisted mostly of unidentifiable grasses (they lacked reproductive parts necessary for identification). The northwest corner of the field has a large pile of tires roughly 60 feet across and more than two meters high. The forested edge of the property on the north, east, and west sides of the property had a medium amount of litter throughout in the form of beer cans, plastic bags, toilet

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<sup>1</sup> Description of sub habitats from <http://oregonexplorer.info/content/forest-and-woodland-habitats?topic=215&ptopic=98>

paper, disposable dishes and silverware, cigarette butts, and other unidentifiable trash (we found one piece of trash every 10 to 30 feet). The forested edges of the property on the north and east side had many small trails going through them, likely due to local residents. During our site visit, we witnessed a local resident bring her dogs through the trees on the eastern side of the property and play with them on the mowed lawn. This is likely a common occurrence because we found dog scat along the edge of the eastern forested border and the mowed field.

Habitat types found were mowed grassland dominated by unknown grasses and invasive forbs, gravel pad, Himalayan blackberry and scotch broom brush areas, and conifer forest dominated by Douglas-fir with some western hemlock, a patch of cottonwoods, and one bigleaf maple sapling (Table 1). The understory of the conifer forest was mainly salal, with Oregon grape, Himalayan blackberry, scotch broom, and the occasional wild rose. Other plants were found at lower frequency and many of the invasive forbs were found at the forest edge outside of the trees but not in the mowed area.

To survey the bird community, we conducted point counts by moving to different locations around the north and east of the field and stopping for 5 minutes of visual and auditory observation (Figure 2). The south, west, and mowed field portion of the site were lower quality habitat. Instead of doing point counts we walked slowly while looking for additional bird species. During the survey, we found 10 species of birds, none of which is currently listed federally or by the state as threatened or endangered (Table 2). All bird species except for the killdeer were seen or heard in the north or eastern wooded borders of Lot A. Killdeer were seen out in the mowed field and on the gravel pad. A pileated woodpecker was identified by its vocalization in the northern wooded portion but was not spotted. The pileated woodpecker is being considered as a Washington State listed species (Attachment 2). To survey plants we used a wandering transect through the wooded areas of the site and in a zig-zagging pattern through the mowed portion of Lot A. We ensured that we walked through dips and other areas that could harbor a different plant community or rare plants. The transect was roughly six feet wide; the biologists examined plants within 3 feet to either side as they walked. We took pictures of plants, identified them in the field, and confirmed identifications from pictures when back in the office. During the survey we found 23 species of plants.

During both transects and bird counts, we noted rabbit and coyote scat but did not see any animal activity. We saw what appeared to be a rabbit trail going under blackberry bushes. We did not see any active dens or nests of any animal. No mountain beaver burrows were seen in the wooded portions of the site. We did not actively look for reptiles, amphibians, or invertebrates as they were expected to be inactive or not present at this time of year.

## Conclusions

Ramboll-Environ did not identify any federal or state listed threatened or endangered species residing on the property. In addition, we can conclude that Lot A does not provide suitable habitat for any threatened or endangered animals and therefore the proposed project will not result in the significant degradation or loss of such habitat (Table 3). Ramboll-Environ acknowledges that December is not the ideal time to conduct such a survey. Due to timing, breeding birds were not present, and we were unable to identify grasses and other plants requiring flowering for identification to the species level.

Ramboll-Environ did not see white-top aster or pacific pea, the two nearest listed plant species that have some habitat overlap with site A (Table 4). It is possible that the mowed field or the field-facing side of forest edges could support either of the two plant species. However, it is unlikely that they are present. Both white-top aster and pacific pea thrive in open areas and forest edges. Prior to 2003, Lot A was forested which would not have been ideal habitat. After 2003, the plant species would have had to disperse to the site which would have been difficult. Both white-top aster and pacific pea disperse primarily through rhizome spread, their seeds are rarely fertile<sup>2,3</sup>. White-top aster is five miles away while pacific pea is over 11 miles distant (Table 4, Figure 4). While unlikely that they are present, a survey conducted in late May for pacific pea, and a survey in late July for white-top aster is necessary to confirm either presence or absence. One species of bird found at Lot A, the pileated woodpecker, is being considered by the state of Washington for listing (Attachment 2). The pileated woodpecker's habitat is preferably old-growth forest, but they have been known to breed in any forest type that includes trees large enough for roosting and nesting<sup>4</sup>.

In addition to the terrestrial habitat survey presented in this letter report, Ramboll conducted a preliminary desktop and field survey in August of 2017 to explore potential impacts to nearby waterways containing Puget Sound Chinook Salmon and other threatened or endangered aquatic species. The review documented recommended types of onsite septic system (OSS) and the stormwater treatment and infiltration systems and explored the probability of contaminants reaching waterways which could result in the degradation or conversion of habitat for Species of Concern. At the Project location, the OSS and infiltration system will be located at least 2,000 feet from either Soosette Creek or Big Soos Creek, allowing for a significant additional buffer area. Because the OSS and infiltration systems are expected to be protective of groundwater at the Project location, it is our opinion, then, that by extension, the systems also will be protective of water quality in Soosette Creek and Big Soos Creek. This opinion is based on the premise that the OSS is properly designed, installed, operated, and maintained, including implementation of best management practices to prevent the introduction of hazardous substances and oil into the system (Attachment 4).

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<sup>2</sup> COSEWIC. 2009. COSEWIC assessment and update status report on the White-top Aster *Sericocarpus rigidus* in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. vi + 26 pp. [http://www.registrelep-sararegistry.gc.ca/document/default\\_e.cfm?documentID=1825](http://www.registrelep-sararegistry.gc.ca/document/default_e.cfm?documentID=1825)

<sup>3</sup> Broich, S. L. 1983. A systematic study of *Lathyrus vestitus* Nutt. Ex T. & G. (Fabaceae) and allied species of the pacific coast. Ph.D. Dissertation in Botany and Plant Pathology from Oregon State University

<sup>4</sup> Seattle Audubon Society [http://www.birdweb.org/birdweb/bird/pileated\\_woodpecker](http://www.birdweb.org/birdweb/bird/pileated_woodpecker)



Yours sincerely

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Postscript: Tables and Figures continue below

## Tables

Table 1. Plant species found on Lot A on 12/11/2017

	Common name	Scientific name	Native
MOWED FIELD	Bedstraw	<i>Galium sp.</i>	Y
	Dandelion	<i>Taraxacum officinale</i>	N
	Fairy Ring Mushroom	<i>Marasmius Oreades</i>	Y
	Geranium	<i>Geranium sp. (probably G. molle)</i>	N
	Grass	<i>Poaceae sp.</i>	?
	Hairy cat's ear	<i>Hypochaeris radicata</i>	N
	Himalayn Blackberry	<i>Rubus armeniacus</i>	N
	Plantain / fleawort	<i>Plantago sp.</i>	N
	Scotch Broom	<i>Cytisus scoparius</i>	N
FORESTED BORDER	Bedstraw	<i>Galium sp.</i>	Y
	Common sow thistle	<i>Sonchus oleraceus</i>	N
	Dandelion	<i>Taraxacum officinale</i>	N
	Deer Fern	<i>Blechnum spicant</i>	Y
	English holly	<i>Ilex aquifolium</i>	N
	Fairy Ring Mushroom	<i>Marasmius Oreades</i>	Y
	Geranium	<i>Geranium sp. (probably G. molle)</i>	N
	Grass	<i>Bromus sp.</i>	?
	Grass	<i>Poaceae sp.</i>	?
	Hairy cat's ear	<i>Hypochaeris radicata</i>	N
	Himalayan Blackberry	<i>Rubus armeniacus</i>	N
	Oregon Grape	<i>Mahonia sp.</i>	Y
	Plantain / fleawort	<i>Plantago sp.</i>	N
	Salal	<i>Gaultheria shallon</i>	Y
	Scotch Broom	<i>Cytisus scoparius</i>	N
	Snowberry	<i>Symphoricarpos albus</i>	Y
	Sorrel	<i>Rumex sp.</i>	N
	Thistle	<i>Carduus sp.</i>	N
	Wild rose	<i>Rosa sp.</i>	Y
	Bigleaf maple	<i>Acer macrophyllum</i>	Y
Cottonwood	<i>Populous trichocarpa</i>	Y	
Douglas Fir	<i>Pseudotsuga menziesii</i>	Y	
Hemlock	<i>Tsuga heterophylla</i>	Y	

Table 2. Bird species found on Lot A on 12/11/2017

	<b>Common name*</b>	<b>Scientific name</b>	<b>Native</b>
<b>Mowed field</b>	Killdeer	<i>Charadrius vociferus</i>	Y
<b>Forested border</b>	American crow	<i>Corvus brachyrhynchos</i>	Y
	Chickadee (either black capped or chestnut backed)	<i>Poecile rufescens</i> or <i>P. atricapillus</i>	Y
	European starling (v)	<i>Sturnus vulgaris</i>	N
	Northern flicker	<i>Colaptes auratus</i>	Y
	Pileated woodpecker (V)	<i>Dryocopus pileatus</i>	Y
	Red breasted nuthatch (v)	<i>Sitta canadensis</i>	Y
	Song sparrow	<i>Melospiza melodia</i>	Y
	Spotted towhee	<i>Pipilo maculatus</i>	Y
	Steller's jay	<i>Cyanocitta stelleri</i>	Y

NOTES:

\* (v) indicates identified by vocalization only

Table 3. Terrestrial animals that are listed federally and in Washington state. Codes for federal and state status are as follows: Federal Endangered (FE), Federal Threatened (FT), Federal Species of Concern (FSC), State Endangered (SE), State Threatened (ST), State Sensitive (SS)

Type	Species	Federal	State	Habitat <sup>a,b</sup>	Habitat overlap
MAMMALS	Pygmy Rabbit	FE	SE	Dense sagebrush	No
	Gray Wolf	FE	SE	Forest and grasslands	Yes <sup>c</sup>
	Grizzly Bear	FT	SE	North Cascades ecosystem	No
	Lynx	FT	SE	Boreal spruce-fir forest	No
	Fisher	FSC	SE	Mature mixed conifer and hardwood forest near riparian areas	No
	Columbian White-tailed Deer	FE	SE	Riparian areas	No
	Woodland Caribou	FE	SE	Selkirk Mountain area	No
	Western Gray Squirrel		ST	Transitional Oregon white-oak forest	No
				Grasslands in Thurston and Pierce Counties with limited rocks in the soil	
		Mazama Pocket Gopher	FT	ST	
BIRDS	Sandhill Crane		SE	Wetlands	No
	Snowy Plover	FE	SE	Sand Beaches	No
	Upland Sandpiper		SE	Grasslands near Spokane	No
	Northern Spotted Owl	FT	SE	Old-growth forests on low to mid-elevations mountains	No
	Streaked Horned Lark	FT	SE	Prairies, sandbars, grassy dunes in western WA	No
	Greater Sage-Grouse	FSC	ST	Shrub-steppe and meadow-steppe habitats	No
	Columbian Sharp-tailed Grouse		ST	Northern Columbia Basin	No
	Ferruginous Hawk		ST	Prairies in Franklin and Benton Counties	No
	Common Loon		SS	Marine bays, large inland lakes	No
INSECTS					
	Oregon Silverspot Butterfly	FT	SE	Salt-spray meadow between Big Creek and Rock Creek, Lane County, Oregon	No

Taylor's Checkerspot	FE	SE	Open grasslands and native grass/oak woodland sites	No
Mardon Skipper	FSC	SE	Native Festuca spp. grasslands with blue violets and common vetch.	No

NOTES:

<sup>a</sup> Habitat for mammals and insects from US Fish and Wildlife Service (<https://www.fws.gov/>)

<sup>b</sup> Habitat for birds from Bird Web by the Seattle Audubon Society (<http://www.birdweb.org/birdweb/>)

<sup>c</sup> While the gray wolf does inhabit forest and grasslands, the amount of available habitat at the site is extremely limited and there are no populations of wolves nearby according to the Washington Department of Fish & Wildlife ([http://wdfw.wa.gov/conservation/gray\\_wolf/](http://wdfw.wa.gov/conservation/gray_wolf/))

Table 4. Listed plant species occurring within 20 miles of Pacific Raceways Lot A. Data from <http://data-wadnr.opendata.arcgis.com/>

Distance (miles)	Common Name	Scientific Name	Habitat	Habitat overlap	Reproduction and dispersal
5.01 <sup>a</sup>	White-top aster	<i>Sericocarpus rigidus</i>	Flat open grasslands in gravelly soils. Seasonally mesic.	Yes	Reproduces primarily through rhizomes. Germination and seedling establishment in the wild is rare. <sup>b</sup>
6.05	Oregon goldenaster	<i>Heterotheca oregona</i>	Sand and gravel bars along rivers	No	
6.62	Canadian St. John's-wort	<i>Hypericum majus</i>	Riparian areas or low wet places	No	
11.36	Pacific pea	<i>Lathyrus vestitus</i> var. <i>ochropetalus</i>	Dry open to wooded areas, forest edges near historical prairies	Yes	Reproduction through rhizomes or seed pods. Due to pollen limitation and seed predation few seeds are fertile. <sup>c</sup>
12.06	Bog clubmoss	<i>Lycopodiella inundata</i>	Sphagnum bogs, wet sandy places, wetlands	No	
13.83	Torrey's peavine	<i>Lathyrus torreyi</i>	Open areas and open woods, Pierce Co. and further south	No	
17.77	Chain fern	<i>Woodwardia fimbriata</i>	Stream banks and wet bogs	No	

**Notes:**

<sup>a</sup> White-top aster also occurs at the following distances in miles (18.4, 18.73, 20.53, 20.62, 20.63)

<sup>b</sup> COSEWIC. 2009. COSEWIC assessment and update status report on the White-top Aster *Sericocarpus rigidus* in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. vi + 26 pp. [http://www.registrelep-sararegistry.gc.ca/document/default\\_e.cfm?documentID=1825](http://www.registrelep-sararegistry.gc.ca/document/default_e.cfm?documentID=1825)

<sup>c</sup> Broich, S. L. 1983. A systematic study of *Lathyrus vestitus* Nutt. Ex T. & G. (Fabaceae) and allied species of the pacific coast. Ph.D. Dissertation in Botany and Plant Pathology from Oregon State University

**Figures**

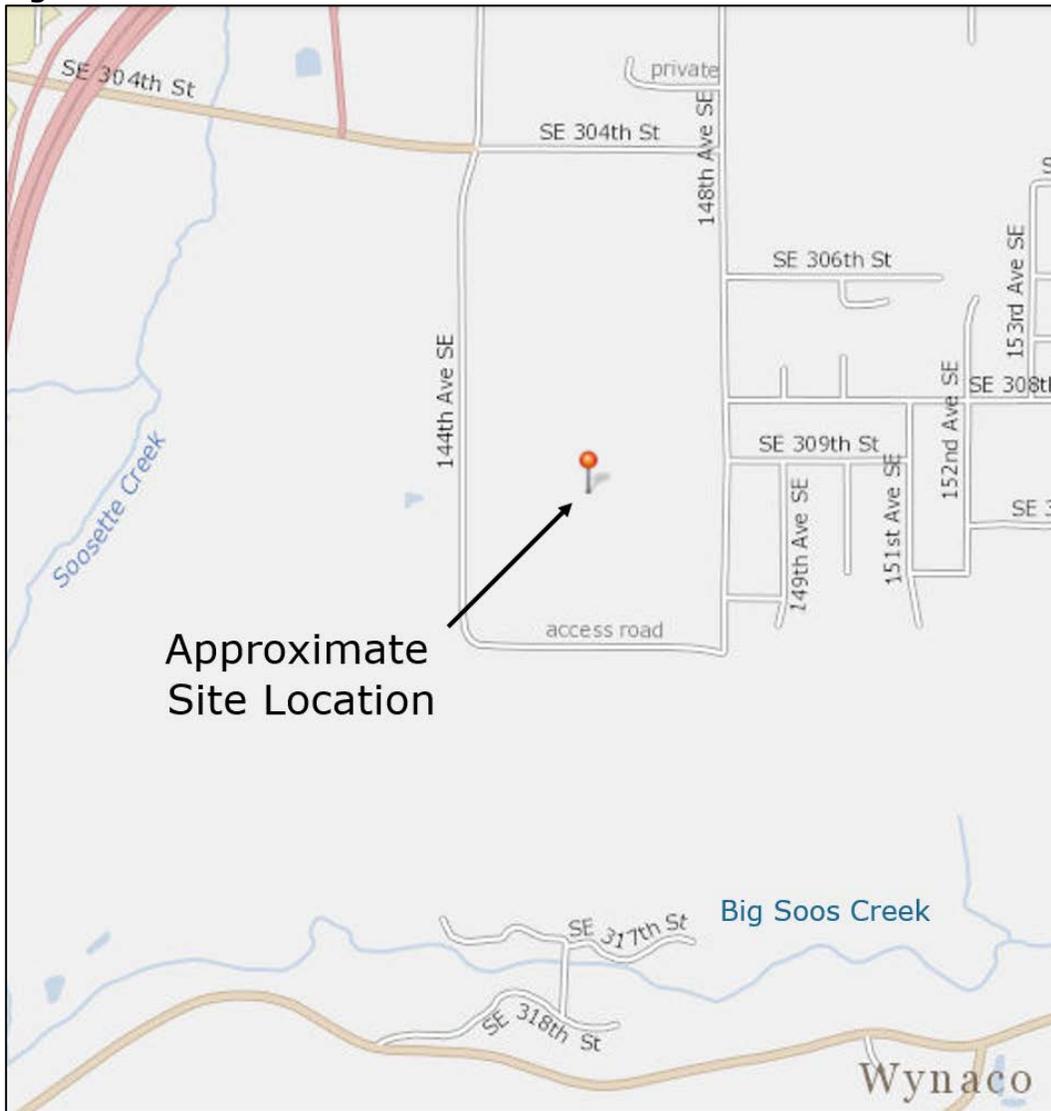


Figure 1. Approximate location of Lot A. Figure prepared using King County iMap (<http://gismaps.kingcounty.gov/iMap/>)

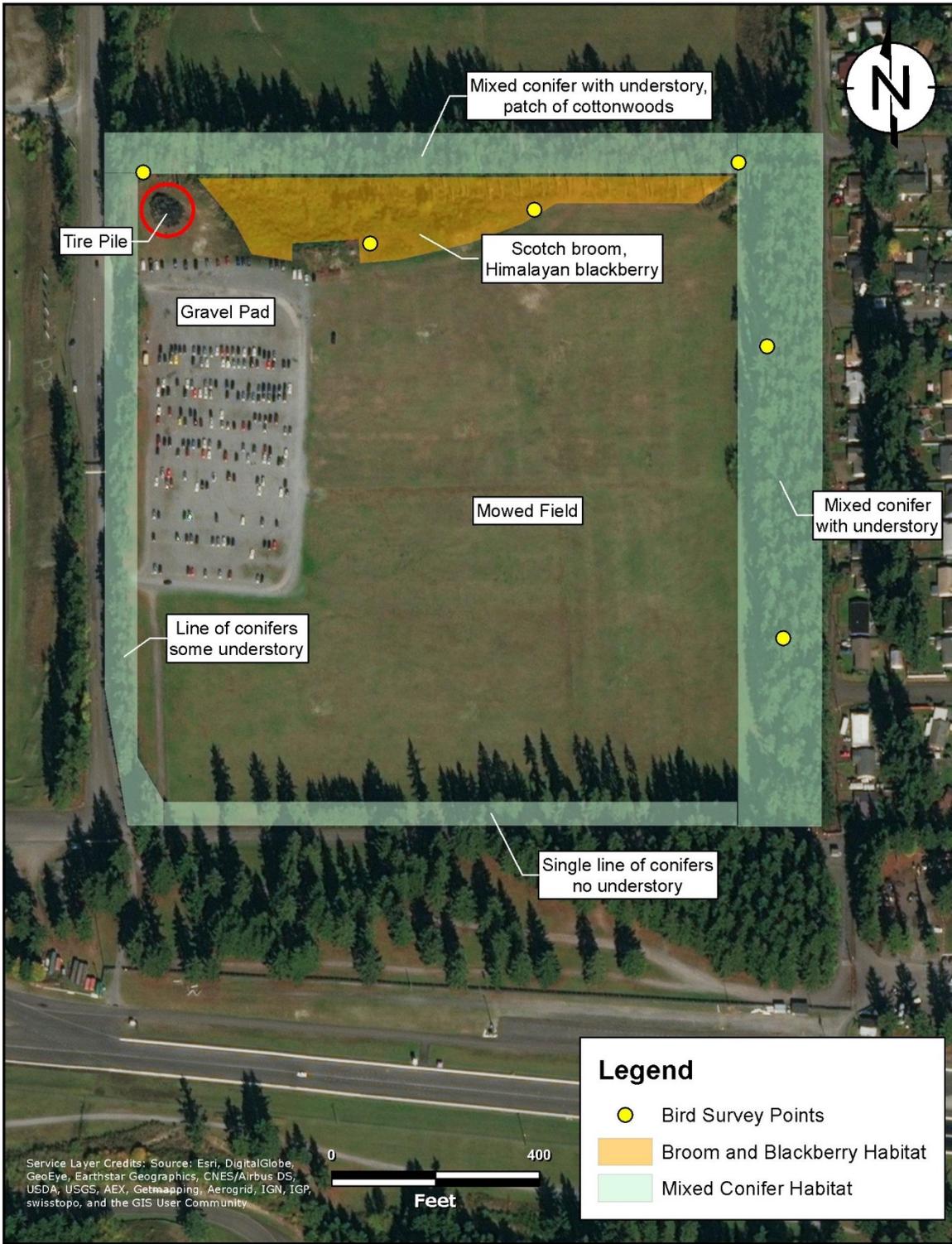


Figure 2. Habitat distribution and other site features of Lot A.



Figure 3. Lot A during a large event at Pacific Raceways.

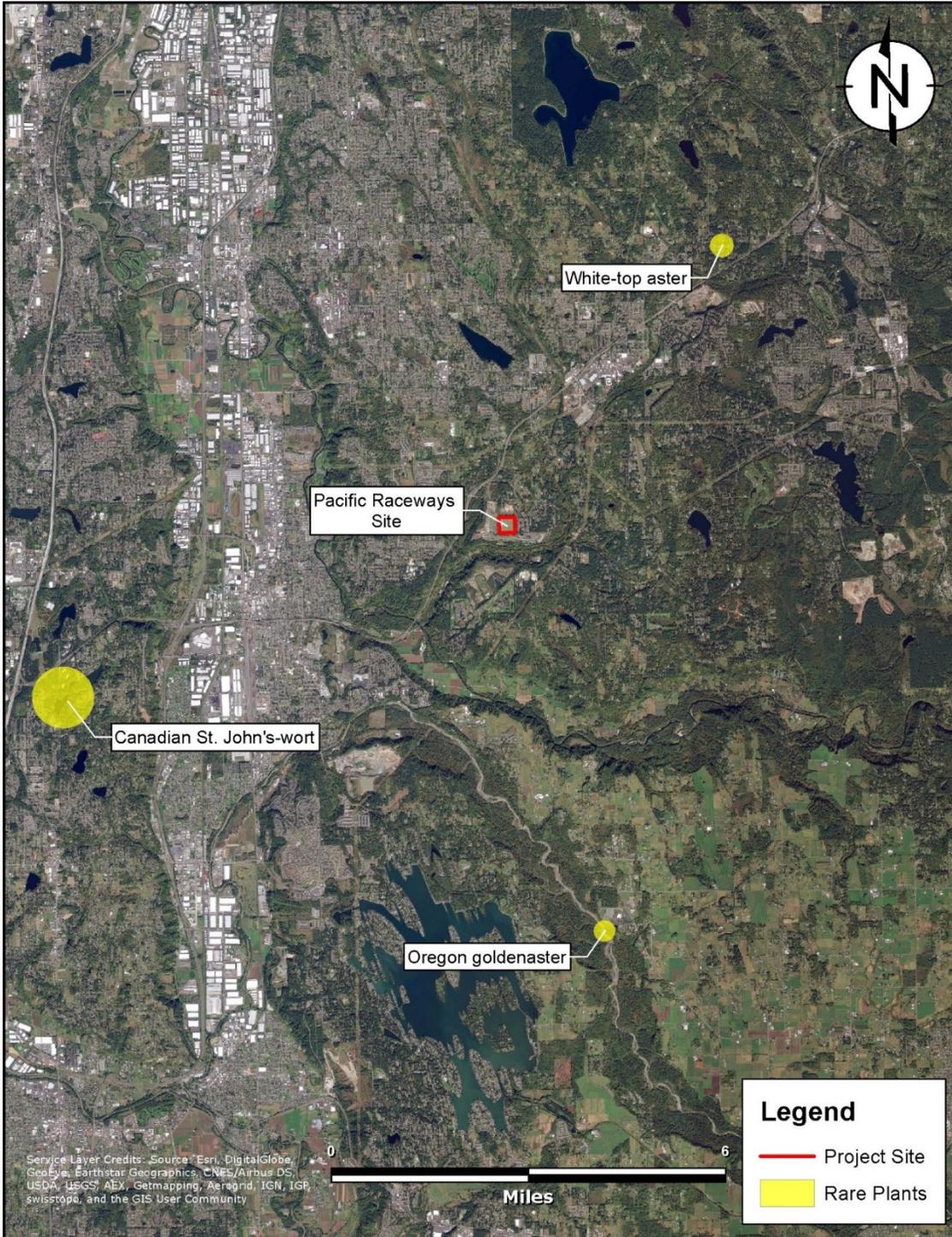


Figure 4. Distance to nearest listed plant species.